

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA

In re:	*	CHAPTER 13
	*	
LESLIE McDANIEL,	*	CASE NO. 12-41231-JTL
	*	
Debtor,	*	JUDGE LANEY

LESLIE McDANIEL, Individually and as	*	
Representative of her Bankruptcy Estate,	*	
	*	
Plaintiff,	*	ADVERSARY PROCEEDING
	*	
vs.	*	NO. 13-04013
	*	
SUNTRUST BANK, SUNTRUST	*	
MORTGAGE, INC., McCALLA	*	
RAYMER, LLC, FOXFIRE ACRES, INC.,	*	
THE UNITED STATES by and through the	*	
THE INTERNAL REVENUE SERVICE,	*	
THE STATE OF GEORGIA (Represented	*	
by the DEPARTMENT OF REVENUE), THE	*	
GROGAN GROUP, LLC d/b/a GROGAN &	*	
GROGAN, and THE COLUMBUS	*	
CONSOLIDATED GOVERNMENT,	*	
	*	
Defendants.	*	

**RESPONSE TO MOTION TO TENDER FUNDS AND FOR EQUITABLE
DISBURSEMENT OF TENDERED FUNDS**

COMES NOW Plaintiff, through counsel, and responds to the Motion to Tender Funds and for Equitable Disbursement of Tendered Funds (“Tender Motion”), and says that same should be denied. The reasons for which it should be denied are more specifically articulated in the Memorandum in Opposition to Motions to Tender Funds and for Equitable Disbursement of Tendered Funds and Motion for Judgment on the Pleadings, and motions of McCalla Raymer and SunTrust for judgment on the pleadings, which is incorporated herein by reference.

Respectfully submitted.

/s/ Fife M. Whiteside
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